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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
ERIC JAMAR GOODALL,)
)
Defendant.)

2:15-cr-00077-JCM-VCF

**STIPULATION TO CONTINUE
SENTENCING AND DISPOSITION**

IT IS HEREBY STIPULATED AND AGREED by and between Defendant, ERIC JAMAR GOODALL, by and through his counsel, TODD M. LEVENTHAL, ESQ., and the United States of America, by its counsel, DANIEL J. COWHIG, Assistant U.S. Attorney, that the sentencing in the above-captioned matter currently set for Monday, August 24, 2015 be reset for at least 60 days.

This Stipulation is entered into for the following reasons

1. Counsel needs additional time to properly effectuate the series of events remaining with this case and the defendant Mr. Goodall.

2. Other issues remain and are pending that are vital to the sentencing of Mr. Goodall.

3. Mr. Goodall is in custody and agrees to the continuance.

4. Additionally, denial of this request for a continuance could result in a miscarriage of justice.

5. Mr. Leventhal has spoken to DANIEL J. COWHIG, Assistant United States Attorney, and he has no objection to this continuance.

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DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)	
)	2:15-cr-00077-JCM-VCF
Plaintiff,)	
)	
vs.)	
)	
ERIC JAMAR GOODALL,)	
)	
Defendant.)	

FINDINGS OF FACT

Based on the stipulation of counsel, and good cause appearing, the Court finds that:

1. Counsel needs additional time to properly effectuate the series of events remaining with this case and the defendant Mr. Goodall.

2. Other issues remain and are pending that are vital to the sentencing of Mr. Goodall.

3. Mr. Goodall is in custody and agrees to the continuance.

4. Additionally, denial of this request for a continuance could result in a miscarriage of justice.

5. Mr. Leventhal has spoken to DANIEL J. COWHIG, Assistant United States Attorney, and he has no objection to this continuance.

6. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161 (h)(7)(A), when considering the factors under Title 18, United States Code, Section 3161(h)(7)(b)i and 3161 (h)(7)(b)(iv). In addition, the continuance sought is not for of delay and the ends of justice are in fact served by the granting of such a continuance which

1 outweigh the best interest of the public and the defendant in a speedy trial.

2
3 **CONCLUSIONS OF LAW**


4 The ends of justice served by granting said continuance outweigh the best interest of the
5 public and the Defendants in a speedy trial, since the failure to grant said continuance would be
6 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the
7 opportunity within which to be able to effectively and thoroughly prepare for trial, taking into
8 account the exercise of due diligence.
9

10 The continuance sought herein is excludable in computing the time within which the trial
11 herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section
12 3161(h)(7)(A) considering the factors under Title 18, United States Code, Sections
13 3161(h)(7)(B)(i) and (ii).
14

15
16 **ORDER**

17 Accordingly, IT IS SO ORDERED that the current Sentencing and disposition setting is
18 vacated and the same is continued and reset for October 27, 2015, at the hour of
19 11:00 a.m., in courtroom # 6A.
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21
22 Dated August 13, 2015.
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25 
26 JAMES C. MAHAN
27 UNITED STATES DISTRICT JUDGE
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